

REMARKS

Applicant thanks the Examiner for extending them the courtesy of an in-person interview on February 8th, 2008. A Statement of Substance of Interview is herein enclosed.

Claims 1-43 are pending. By this Amendment, claims 1, 17, 22, 23, 24, 25, 26, 27, 30 and 39 are amended and claim 31 is canceled. Applicant considers that no new matter will be incorporated into the present application by entry of this Amendment. If the Office deems any additional fees to be necessary for filing or entering this Amendment, then the Office is authorized and requested to charge such fees to Deposit Account No. 061910.

In the Office Action mailed September 10, 2007, the Examiner: rejected claims 1-2, 13-14, 16-17, and 19 under §102(b) as being anticipated by U.S. Patent Publication No. 2002/0015855 to Sajoto et al. ("Sajoto"); rejected claims 3-12 and 22-33 under §103(a) as being unpatentable over Sajoto in view of U.S. Patent No. 6,659,331 to Thach et al. ("Thach"); rejected claims 15 and 18 under §103(a) as being unpatentable over Sajoto as applied to claims 1 and 17; rejected claims 20-21 under §103(a) as being unpatentable over Sajoto as applied to claim 17 and further in view of U.S. Patent Publication No. 2002/0102858 to Wicker et al. ("Wicker"); rejected claims 34-38 under §103(a) as being unpatentable over Sajoto and Thach as applied to claim 30 and further in view of Wicker; and rejected claims 39-43 under §103(a) as being unpatentable over Sajoto in view of Thach and further in view of Wicker.

Independent claims 1 and 17 have been rejected under §102(a) as being anticipated by Sajoto. Amended claim 1 and claim 17 each call for, *inter alia*, a sputtering chamber and a non-rigid, removable liner positioned adjacent a selected interior surface of the sputtering chamber. Sajoto fails to disclose a *removable* liner for a *sputtering* chamber.

Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. W.L. Gore & Assocs. V. Garlock, Inc., 721 F.2d 1540, 200 USPQ 303, 313 (Fed. Cir. 1983). It is not enough that the reference disclose all the claimed elements in isolation. Rather, the prior art reference must disclose each element of the claimed invention *arranged as in the claim*. Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984) (citing Connell v. Sears, Roebuck & Co., 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983) (emphasis added)). Sajoto fails to disclose all of the claimed features as arranged in claim 1.

Sajoto fails to disclose providing a removable liner in this sputtering chamber. At best, Sajoto discloses a lower shield 32 and an upper shield 40 disposed in the chamber to shield the interior surfaces of the chamber enclosure from deposition. *See Sajoto paragraphs [0032]-[0035]*. However, these shields 32, 40 are permanent structures within the chamber and cannot be construed to be removable liners. Sajoto then discloses a separate CVD chamber, as illustrated in Figure 3 below.

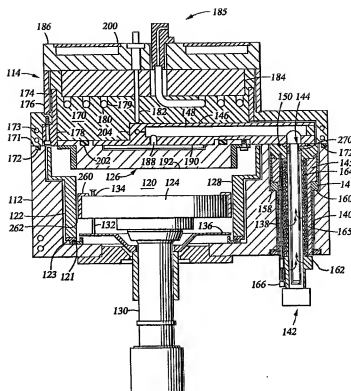


Fig. 3

Here, Sajoto discloses providing a removable deposition chamber liner 128. However, Sajoto fails to disclose providing this removable deposition chamber liner inside of its sputtering cavity that is illustrated in Figure 1. Further, Sajoto fails to disclose a removable liner that is non-rigid. Therefore, Sajoto fails to anticipate independent claims 1, 17, and claims depending thereon. Applicant respectfully requests the Examiner to withdraw the §102(b) rejections.

Independent claim 22 has been rejected under §103(a) as being unpatentable over Sajoto in view of Thach. Amended claim 22 calls for, *inter alia*, a sputtering chamber including a removable liner positioned adjacent a selected interior surface of the chamber, the liner comprising a non-rigid mat of fibrous material. Sajoto fails to disclose a sputtering chamber including a removable liner, as already discussed with respect to claims 1 and 17. Further, Thach fails to disclose any material, whether it be a removable liner or other material, that is fibrous or otherwise includes fibers. The Examiner argues that Thach's Figure 3B, illustrated below, depicts the microstructure of the aluminum grains randomly intertangled and that the grains are fibers.

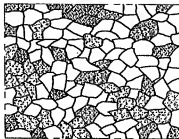


Fig. 3B

Applicant respectfully disagrees with the Examiner's characterization of the aluminum grains. The grains are not fibers. Instead, Thach uses the term "grain" to describe a crystal or particle of aluminum. Further, neither Sajoto nor Thach disclose a removable liner that is non-rigid. Applicant respectfully requests the Examiner to withdraw the §103(a) rejection of claim 22.

Independent claim 23 has been rejected under §103(a) as being unpatentable over Sajoto in view of Thach. Amended independent claim 23 calls for, *inter alia*, a sputtering chamber including a removable liner positioned adjacent a selected interior surface of the chamber, the liner comprising a non-woven web of fibers, wherein the fibers are disposed in a randomly intertangled manner. Independent claim 23 is patentable for at least the reasons already given with respect to claim 22. Further, neither Sajoto nor Thach disclose a removable liner comprising a non-woven web of fibers, wherein the fibers are disposed in a randomly intertangled manner. Applicant respectfully requests the Examiner to withdraw the §103(a) rejection of claim 23.

Independent claim 24 has been rejected under §103(a) as being unpatentable over Sajoto in view of Thach. Amended independent claim 24 calls for, *inter alia*, a sputtering chamber including a removable liner positioned adjacent a selected interior surface of the chamber, the liner comprising a plurality of fibers and a fiber-retaining binder material. Independent claim 24 is patentable for at least the reasons already given with respect to claim 22. Further, neither Sajoto nor Thach disclose a removable liner comprising a plurality of fibers and a fiber-retaining binder material. Applicant respectfully requests the Examiner to withdraw the §103(a) rejection of claim 24.

Independent claim 25 has been rejected under §103(a) as being unpatentable over Sajoto in view of Thach. Amended independent claim 25 calls for, *inter alia*, a sputtering chamber including a removable liner positioned adjacent a selected interior surface of the chamber, the

liner comprising a plurality of fibers, wherein the liner has a ratio of thickness to fiber diameter of at least 5 to 1. Independent claim 25 is patentable for at least the reasons already given with respect to claim 22. Further, neither Sajoto nor Thach disclose a removable liner comprising a plurality of fibers, wherein the liner has a ratio of thickness to fiber diameter of at least 5 to 1. Applicant respectfully requests the Examiner to withdraw the §103(a) rejection of claim 25 and claims depending thereon.

Independent claim 27 has been rejected under §103(a) as being unpatentable over Sajoto in view of Thach. Amended independent claim 27 calls for, *inter alia*, a method of applying thin films onto substrates, the method comprising providing a sputtering chamber having a sputtering cavity including a removable liner positioned adjacent a selected interior surface of the chamber, the liner comprising a non-rigid mat of fibrous material. Independent claim 27 is patentable for at least the reasons already given with respect to claim 22. Further, neither Sajoto nor Thach disclose a non-rigid mat of fibrous material. Applicant respectfully requests the Examiner to withdraw the §103(a) rejection of claim 27 and claims depending thereon.

Independent claim 30 has been rejected under §103(a) as being unpatentable over Sajoto in view of Thach. Independent claim 20 calls for, *inter alia*, a sputtering chamber including a removable liner positioned adjacent a selected interior surface of the chamber, the liner comprising a plurality of fibers each having a diameter of less than about 300 micrometers. Independent claim 30 is patentable for at least the reasons already given with respect to claim 22. Further, neither Sajoto nor Thach disclose a removable liner having a plurality of fibers each having a diameter of less than about 300 micrometers. Applicant respectfully requests the Examiner to withdraw the §103(a) rejection of claim 30 and claims depending thereon.

Independent claim 39 has been rejected under §103(a) as being unpatentable over Sajoto in view of Thach and further in view of Wicker. Amended independent claim 39 calls for, *inter alia*, a sputtering chamber including a removable liner positioned adjacent a selected interior surface of the chamber, said selected interior surface comprising a central surface region defined by the chamber's ceiling, the liner comprising a non-rigid mat of fibrous material, wherein the two targets are spaced apart such that adjacent the central surface region the liner is exposed to material sputtered in the chamber, wherein the liner is mounted adjacent said selected interior surface by a plurality of aluminum fasteners each having a roughened surface exposed to material sputtered in the chamber. Independent claim 39 is patentable for at least the reasons

already given with respect to claim 22. Further, there is nothing in Wicker that remedies the deficiencies of Sajoto and Thach, as already discussed above. Even further, neither Sajoto nor Thach nor Wicker disclose a non-rigid mat of fibrous material. Applicant respectfully requests the Examiner to withdraw the §103(a) rejection of claim 39 and claims depending thereon.

Therefore, Applicants submit the present application is in condition for allowance, and favorable consideration and prompt allowance are respectfully requested. The Examiner is invited to telephone the undersigned to discuss the present application.

Respectfully submitted,

/Kara K. Fairbairn/
Kara K. Fairbairn
Registration No. 49,079

Customer No. 22859
Fredrikson & Byron, P.A.
200 South Sixth Street
Suite 4000
Minneapolis, MN 55402-1425 USA
Telephone: (612) 492-7000
Facsimile: (612) 492-7077

Please grant any extension of time necessary for entry; charge any fee due to Deposit Account No. 06-1910.

4303041_1.DOC